

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES of AMERICA)
)
vs.) No. 05-CR-30020 MAP
)
EDDIE SANTIAGO)

DEFENDANT'S PRESENTENCE REPORT OBJECTIONS

Criminal History Category - Defendant's objection. . . the defendant believes the defendant's Criminal History Category overstates the seriousness of the defendant's Criminal History. The defendant should be entitled to a departure pursuant to U.S.S.G. 4A1(3)(b). Defendant received 26 Criminal History Points for a combination of State misdemeanor, and motor vehicle offenses, occurring more than 10 years ago. See paragraphs 42, 43, 44, 46, 48, 52, 55, 56, 57, 59, 60, 61, 62, 63, 64, 66, and 67.

Three were for attaching plates and ten were for operating motor vehicle after suspension. Miscellaneous possession of Class D substance, one for trespassing, one for leaving the scene/personal injury and one for failure to stop/disorderly conduct.

The receiving stolen property charge concerned a license plate; the larceny charge was a state misdemeanor, involving less than \$200.00; in each case a nominal fine was imposed.

Respectfully submitted,
THE DEFENDANT

BY:/s/ Vincent A. Bongiorno
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CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to the United States District Attorney, Federal Building & Courthouse, 1550 Main Street, Springfield, MA 01103 this 10 day of August 2007.

/s/ Vincent A. Bongiorno